## BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 20, SUBREGION 37

STEPHENS MEDIA, LLC d/b/a	)	
HAWAII TRIBUNE-HERALD	)	
	)	
Employer,	) CASE I	Nos. 37-CA-7043
	)	37-CA-7045
	)	37-CA-7046
	)	37-CA-7047
AND	)	37-CA-7048
	)	37-CA-7084
	)	37-CA-7085
HAWAII NEWSPAPER GUILD,	)	37-CA-7086
LOCAL 39117,	)	37-CA-7087
COMMUNICATIONS WORKERS OF AMERICA,	)	37-CA-7112
AFL-CIO	)	37-CA-7114
	)	37-CA-7115
Union.	j j	37-CA-7186

## MOTION FOR PERMISSION TO EXCEED EXCEPTIONS BRIEF PAGE LIMIT

COMES NOW, the Employer, Stephens Media, LLC, d/b/a Hawaii Tribune-Herald (hereafter "HTH"), by and through counsel, and serves this MOTION FOR

PERMISSION TO EXCEED THE EXCEPTIONS BRIEF PAGE LIMIT pursuant to Section 102.46(j)

of the Rules and Regulations of the National Labor Relations Board, Series 8, as

amended. Section 102.46(j) calls for a 50-page limit to briefs in support of a party's

exceptions.

Administrative Law Judge John J. McCarrick issued his opinion on March 6, 2008. HTH, however, did not obtain a copy of this decision until March 10, 2008. Concurrent with the timing of this Motion, HTH is filing a separate MOTION TO REQUEST

AN EXTENSION TO FILE EXCEPTIONS TO THE DECISION OF THE ADMINISTRATIVE LAW JUDGE.

This is a voluminous case, touching upon over one dozen issues. ALJ

McCarrick's recommended Order is 41 pages long. The hearing itself went on for seven

(7) days, with eighteen (18) witnesses, over 150 exhibits, and a transcript approaching

1300 pages.

Based on the length of the Record, the number of charges, the length of the opinion and the anticipated number of excepted to findings, this case will require more time and effort than a typical NLRB case. In addition, both *HTH* and General Counsel submitted Post-Hearing Briefs exceeding 100 pages in length. The lengths of these briefs as well as the breadth of the Record show the extent and complexity of the issues in the present case. The brief in support of the exceptions to ALJ McCarrick's decision will require a substantially similar level of detail and analysis, presumably totaling 100 pages like the Post-Hearing Briefs. Counsel for General Counsel has given their consent to a 100-page limit on the brief in support of the exceptions.

Accordingly, *HTH* requests permission to file a 100-page brief in support of its exceptions

DATED: March 18, 2008

Nashville, Tennessee

Respectfully submitted,

THE ZINSER LAW FIRM, P.C.

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Glenn E. Prosa

414 Union Street, Suite 1200 Bank of America Plaza

Nashville, TN 37219

Telephone: (615) 244-9700

Facsimile: (615) 244-9734

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOIION FOR

PERMISSION TO EXCEED BRIEF PAGE LIMIT was served electronically and via Federal

Express on this 18th day of March 2008, on the following parties:

Lester Heltzer **Executive Secretary** National Labor Relations Board 1099 14th Street, N.W. Washington, D.C. 20570-0001

Joseph Norelli, Regional Director Region 20 901 Market Street Suite 300 San Francisco, CA 94103-1771

Ms. Meredith Burns, Esq. National Labor Relations Board SubRegion 37 300 Ala Moana Boulevard, Room 7-245 Honolulu, Hawaii 96850-0001

Mr. Wayne Cahill Hawaii Newspaper Guild, Local 39117 1347 Kaplolani Boulevard, Suite 404 Honolulu, Hawaii 96814

Glenn E. Plosa